

# EXHIBIT 3

United States District Court  
Eastern District of Tennessee  
At Chattanooga

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Ecolab, Inc. and Nalco Company, LLC d/b/a  
Nalco Water, an Ecolab Company and/or  
Nalco Water

Plaintiffs

v.

Anthony Ridley and ChemTreat

Defendants

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No. 1:22-CV-00050

TRM-SKL

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**Anthony Ridley's Answers and Objections to Plaintiffs' First Interrogatories**

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Comes the Defendant, Anthony Ridley ("Ridley"), by and through counsel, and hereby answers the Interrogatories that have been submitted to him by Ecolab, Inc. and Nalco Company d/b/a/ Nalco Water.

**GENERAL OBJECTIONS AND RESERVATION OF RIGHTS**

**IN RESPONSE TO INTERROGATORIES**

Ridley asserts the following General Objections to Plaintiffs' Interrogatories:

1. Ridley objects to Plaintiffs' Interrogatories to the extent that they purport to impose upon Ridley any burden to respond beyond the scope of response required by the Federal Rules of Civil Procedure.

2. Ridley objects to Plaintiffs' Interrogatories to the extent that they request information that is protected from disclosure by the attorney-client and/or work product privileges or protected by any other applicable privilege or protection. In addition, to the extent that the information requested was prepared in anticipation of litigation or in preparation for trial by or for

or whose account was supervised by or assigned to him at any time during the twelve-month period immediately preceding Ridley's resignation from EcoLab.

*Interrogatory No. 1 is comprised of 2 interrogatories, for a total of 2 interrogatories.*

2. State whether You have had (or currently have) access to any Ecolab trade secrets, Confidential Information or proprietary information since the end of your employment with Ecolab. If so, please identify all Documents, Communications, and Storage Media comprising, containing, or concerning Ecolab trade secrets, Confidential Information or proprietary information that you had access to at any time since the end of your employment at Ecolab.

RESPONSE:

Objection: Ridley objects to the terms "trade secrets, Confidential Information, or proprietary information" as vague and ambiguous. Plaintiffs do not define the term "trade secrets" or "proprietary information" in their first set of interrogatories. Accordingly, Plaintiffs have not defined with particularity what information they are seeking. Subject to and without waiving this objection or any other general objection Ridley states he backed up files from his work laptop while employed with Nalco Water to an external hard drive before the company had a cloud based backup system. Ridley did this to ensure the files would not be lost or destroyed in the event his laptop failed or was damaged or stolen. Mr. Ridley believes he backed up the files sometime in 2015 or 2016. Ridley located those files after he left EcoLab in July 2021 and deleted the files. Ridley no longer has access to or a copy of those files. Ridley also located three (3) USB drives that he believes he received at industry events while employed with Nalco Water / EcoLab. Ridley located these USB drives in an old bag after EcoLab initiated this action. Ridley's counsel at the time returned the USB drives to EcoLab pursuant to counsel's instructions. Ridley no longer has access to any files

that were on those USB drives. By providing this response Ridley does not consent or admit that he possessed or misappropriated in anyway any EcoLab trade secrets, confidential information, or proprietary information.

*Interrogatory No. 2 is comprised of 1 interrogatory, for a total of 3 interrogatories.*

3. Identify all Documents, Communications, and Storage Media comprising, containing, or concerning Ecolab trade secrets, Confidential Information, or proprietary information that You retained possession, custody or control of at any point after the end of Your employment with Ecolab.

RESPONSE:

Objection: Ridley objects to the terms “trade secrets, Confidential Information, or proprietary information” as vague and ambiguous. Plaintiffs do not define the term “trade secrets” or “proprietary information” in their first set of interrogatories. Accordingly, Plaintiffs have not defined with particularity what information they are seeking. Subject to and without waiving this objection or any other general objection Ridley states that he no longer has the three (3) USB drives referenced in his response to Interrogatory No. 2 as his counsel returned them to EcoLab pursuant to the instructions provided by EcoLab’s counsel. The external hard drive referenced in response to Interrogatory No. 2 is a WD My Book external hard drive now in the possession of Ridley’s counsel.

*Interrogatory No. 3 is comprised of 1 interrogatory, for a total of 4 interrogatories.*

4. Identify all Devices and Storage Media that have been (or currently are) in your possession, custody or control at any time between May 1, 2021 to present which were used to store, copy, print, view, download, upload, or otherwise access copies of Ecolab’s trade secrets,